

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MID-AMERICA CARPENTERS REGIONAL COUNCIL PENSION FUND; MID-AMERICA CARPENTERS REGIONAL COUNCIL HEALTH FUND; MID-AMERICA CARPENTERS REGIONAL COUNCIL APPRENTICE AND TRAINEE PROGRAM; and MID-AMERICA CARPENTERS REGIONAL COUNCIL SUPPLEMENTAL RETIREMENT FUND,

Plaintiffs,

v.

DOCK & DOOR INSTALL, INC., an Illinois corporation and MIDWEST DOCK SOLUTIONS, INC., an Illinois corporation,

Defendants.

Case No 1:24-cv-06428

Judge Andrea R. Wood

Magistrate Judge Jeannice W. Appenteng

**PARTIES' JOINT MOTION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS**

The Parties, jointly, through their undersigned counsel hereby submit this motion to extend the time in which to file dispositive motions. In support hereof, the Parties state:

1. On October 17, 2025, the Court set the filing date for dispositive motions as January 9, 2026.
2. The record in this case is voluminous, including thousands of pages of documents, and approximately 18 depositions taken.
3. In addition to completing discovery, the intervening holidays, and preparing for potential dispositive motions, the parties recently re-engaged on settlement discussions. Counsel for Defendant Midwest Dock Solutions also underwent major surgery in late October, with associated recovery.

4. Accordingly, while the Parties have continued to work on this matter diligently, they now jointly request a one-week extension of the deadline to file dispositive motions, until January 16, 2026. The parties also request the commensurate Response and Reply briefing deadlines be extended by one week, to February 13, 2026 and March 6, 2026, respectively.

WHEREFORE, the Parties jointly request the Court enter an Order granting the Parties' Joint Motion to extend the dispositive motion briefing schedule as follows: (a) dispositive motions to be filed by January 16, 2026; (b) Response briefs to be filed by February 13, 2026; (c) Reply briefs to be filed by March 6, 2026; and (d) striking the telephonic status hearing currently set for March 5, 2026, and resetting to a date after dispositive motions are fully briefed, based on the Court's schedule and availability.

Respectfully submitted: January 7, 2026.

MID-AMERICA CARPENTERS REGIONAL COUNCIL PENSION FUND *et al.* DOCK & DOOR INSTALL, INC.

By: /s/ Kevin P. McJessy  
One of Their Attorneys

Kevin P. McJessy  
McJessy Ching & Thompson, LLC  
3759 N. Ravenswood Ave.  
Suite 231  
Chicago, IL 60613

By: /s/ Todd Miller  
One of Its Attorneys

Todd Miller  
Kathleen Cahill  
Allococo, Miller & Cahill, PC  
20 N. Wacker Dr., Ste. 3517  
Chicago, IL 60606

MIDWEST DOCK SOLUTIONS, INC.

By: /s/ Michael F. Hughes  
One of Its Attorneys

Jeffrey A. Risch  
Michael F. Hughes  
Amundsen Davis, LLC  
3815 E. Main St., Suite A-1  
St. Charles, IL 60174

**CERTIFICATE OF SERVICE**

I hereby certify that on January 7, 2026, I caused the foregoing **PARTIES' JOINT MOTION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS** to be electronically filed with the Clerk of the Court using the CM/ECF system which will send notification to all parties of record.

By: /s/ Michael F. Hughes

One of Its Attorneys

Jeffrey A. Risch, Esq. (ARDC No.: 6271407)  
Michael F. Hughes, Esq. (ARDC No.: 6279175)  
AMUNDSEN DAVIS, LLC  
3815 E. Main Street, Suite A-1  
St. Charles, IL 60174  
(630) 587-7910 – Telephone  
(630) 587-7960 - Facsimile  
[JRisch@amundsendavilaw.com](mailto:JRisch@amundsendavilaw.com)  
[MHughes@amundsendavilaw.com](mailto:MHughes@amundsendavilaw.com)  
*Attorneys for Defendant, Midwest Dock Solutions, Inc.*